

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Criminal No. 1:23-CR-112

ROBERT JAMES FISCHER, also known as  
"ZACHARY BROWN" and "BOBBY"

*And*

CHEERISH NOEL TAYLOR, also known as  
"Cece"

*Defendants.*

**CONSENT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER**

The United States of America, by and through undersign counsel, respectfully moves this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). Counsel for the defendants, Robert James Fischer and Cheerish Noel Taylor, have reviewed the proposed protective order and do not oppose the filing of this motion. In support thereof, the United States submits the following:

1. During the course of the investigation, the United States has gathered or generated documents, including electronic records, which contain confidential information and personal identifiers for the defendants, unindicted co-conspirators, and cooperating individual(s) in this case. These materials currently include and are anticipated to include, but are not limited to, law enforcement investigative reports, cellular phone extractions, and other sensitive materials. The United States intends to produce these documents and electronic records, in accordance with the

Federal Rules of Criminal Procedure, relevant case law, and any Discovery Orders that are agreed upon and entered in this case.

2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of documents and electronic records obtained through discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as necessary for the defendants' investigations of the allegations and preparation of their defenses.


3. The defendants' attorneys have reviewed the proposed protective order, and have agreed to its terms.

WHEREFORE, the undersigned respectfully requests that the Court enter the proposed protective order.

Respectfully submitted,

Jessica D. Aber  
United States Attorney

By:

  
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Heather D. Call  
Assistant United States Attorney